THE HONORABLE JUSTIN QUACKENBUSH 1 2 3 4 5 6 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF WASHINGTON AT SPOKANNE 10 11 ReconTrust Company, N.A., Mortgage Case No.: CV-12-00378-JLQ Electronic Registration Systems, Inc., A 12 Delaware Corp., Countrywide Bank. COUNTER DEFENDANT'S REPLY TO FSB, DOES 1 – 10, Federal National COUNTER CLAIMANT'S COUNTERCLAIM 13 Mortgage Association, FOR ATTORNEY'S FEES 14 Counter Claimant. VS. 15 Gregory A. Beadles, 16 17 **Counter Defendant.** 18 COMES NOW COUNTER DEFENDANT, Gregory Beadles (hereafter "Counter Defendant"), by 19 and through his attorneys of record, John A. Long and John Long Law PLLC (hereafter "Counsel"), 20 and hereby answers the Counter Claimant's Counterclaim for Attorney's Fees as follows: 21 1) Answering Counter Claimant's Counterclaim for Attorney's Fees, Counter Claimant's 22 Counterclaim refers to a written document, the Deed of Trust, which is the best evidence of its 23 contents. To the extent the allegations contained in Counterclaimant's Counterclaim contradict the 24 writing, they are denied. As to the remaining allegations, the allegations state conclusions or 25 recitations of law which no response is required. To the extent a response is required, the allegations 26 in Counter Claimant's Counterclaim are denied. 27 /// 28

Case 2:12-cv-00378-JLQ Document 25 Filed 01/03/13

1	
2	RESPECTFULLY SUBMITTED this 3rd day of January, 2013.
3	JOHN LONG LAW PLLC
4	
5	/s/ John A. Long John A. Long, WSBA No. 15119
6	Counsel for Plaintiff
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

REPLY TO COUNTERCLAIM - Page 2

1 **DECLARATION OF SERVICE** 2 3 I, Brett Masch, certify under penalty of perjury under the laws of the State of Washington, that 4 on January 3, 2013, I electronically filed the foregoing Plaintiff's Final Disclosure of Witnesses with the United States District Court of Eastern Washington Clerk of the Court using the CM/ECF system 5 which will send notification of such filing to the following, in addition, I have also mailed the 6 forgoing to the following via email: 7 John S. Devlin, III 8 Lane Powell PC- SEA 1420 Fifth Avenue Suite 4100 9 Seattle, WA 98101 Email: devlinj@lanepowell.com 10 11 DATED this 3rd day of January, 2013. 12 13 /s/ Brett C. Masch Brett C. Masch WSBA #43851 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

REPLY TO COUNTERCLAIM - Page 3